

Virginia Title V Operating Permit

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Chesapeake Hardwood Products, Inc.
Facility Name:	Chesapeake Hardwood Products, Inc.
Facility Location:	201 Dexter Street, West Chesapeake, Virginia
Registration Number:	60851
Permit Number:	TRO-60851

January 29, 2001
Original Permit Effective Date

June 20, 2005
Modification Effective Date

January 28, 2006
Expiration Date

(for)
Director, Department of Environmental Quality

June 20, 2005
Signature Date

Table of Contents

I.	FACILITY INFORMATION.....	4
II.	EMISSION UNITS.....	5
III.	PROCESS EQUIPMENT REQUIREMENTS - MULTI-LINE (NSR PERMIT REQUIREMENTS).....	6
	A. LIMITATIONS	6
	B. MONITORING	7
	C. RECORDKEEPING	7
IV.	PROCESS EQUIPMENT REQUIREMENTS - UV-LINE (NSR PERMIT REQUIREMENTS).....	8
	A. LIMITATIONS	8
	B. MONITORING	9
	C. RECORDKEEPING	10
V.	PROCESS EQUIPMENT REQUIREMENTS - HARWOOD PLYWOOD LAYUP-LINE (NSR PERMIT REQUIREMENTS).....	11
	A. LIMITATIONS	11
	B. MONITORING	12
	C. RECORDKEEPING	12
VI.	MULTI, UV, AND HARDWOOD LAYUP LINES (NSR GENERAL REQUIREMENTS)	13
	A. LIMITATIONS	13
	B. RECORDKEEPING	14
	C. REPORTING.....	14
	D. TESTING	15
VII.	PROCESS EQUIPMENT REQUIREMENTS - CHESAPEAKE AND STYLE GRAIN LINES.....	15
	A. LIMITATIONS	15
	B. MONITORING	17
	C. RECORDKEEPING	17
VIII.	PROCESS EQUIPMENT REQUIREMENTS - PAPER LAMINATE LINE.....	18
	A. EMISSION LIMITATIONS.....	18
	B. MONITORING	19
	C. RECORDKEEPING	19
IX.	PROCESS EQUIPMENT REQUIREMENTS - WOODHOG.....	20
	A. LIMITATIONS	20
	B. MONITORING	20
	C. RECORDKEEPING	21
X.	PROCESS EQUIPMENT REQUIREMENTS - CUT TO SIZE OPERATIONS.....	22
	A. LIMITATIONS	22
	B. MONITORING	22
	C. RECORDKEEPING	23
XI.	LAYUP, MULTI, CHEASPAEAKE, STYLE GRAIN, PAPER LAMINATE, UV, LINES - (MACT REQUIREMENTS).....	23
XII.	INSIGNIFICANT EMISSION UNITS	24
XIII.	PERMIT SHIELD & INAPPLICABLE REQUIREMENTS.....	24

XIV. GENERAL CONDITIONS.....	25
A. FEDERAL ENFORCEABILITY	25
B. PERMIT EXPIRATION	25
C. RECORDKEEPING AND REPORTING	26
D. ANNUAL COMPLIANCE CERTIFICATION.....	27
E. PERMIT DEVIATION REPORTING	28
F. FAILURE/MALFUNCTION REPORTING	28
G. SEVERABILITY	28
H. DUTY TO COMPLY.....	28
I. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE	29
J. PERMIT MODIFICATION	29
K. PROPERTY RIGHTS	29
L. DUTY TO SUBMIT INFORMATION.....	29
M. DUTY TO PAY PERMIT FEES.....	30
N. FUGITIVE DUST EMISSION STANDARDS.....	30
O. STARTUP, SHUTDOWN, AND MALFUNCTION	31
P. ALTERNATIVE OPERATING SCENARIOS	31
Q. INSPECTION AND ENTRY REQUIREMENTS	31
R. REOPENING FOR CAUSE	32
S. PERMIT AVAILABILITY	32
T. TRANSFER OF PERMITS.....	33
U. MALFUNCTION AS AN AFFIRMATIVE DEFENSE	33
V. PERMIT REVOCATION OR TERMINATION FOR CAUSE.....	34
W. DUTY TO SUPPLEMENT OR CORRECT APPLICATION	34
X. STRATOSPHERIC OZONE PROTECTION	35
Y. ASBESTOS REQUIREMENTS.....	35
Z. ACCIDENTAL RELEASE PREVENTION.....	35
AA.CHANGES TO PERMITS FOR EMISSIONS TRADING	35
BB. EMISSIONS TRADING	35
XV. STATE-ONLY ENFORCEABLE REQUIREMENTS.....	36

I. Facility Information

Permittee

Chesapeake Hardwood Products, Inc.
P.O. Box 1188
Chesapeake, VA 23327-1188

Responsible Official

J.A. (Jay) Byrd
Vice President Manufacturing Services

Facility

Chesapeake Hardwood Products, Inc.
201 Dexter Street, West
Chesapeake, VA 23327

Contact Person

John Mays
Safety & Compliance Manager
(759) 543-1601

County-Plant Identification Number: 51-550-00056

Facility Description: NAICS 321211. The source is a flatwood paneling facility with five production lines of wood building products and one hardwood plywood production line.

Multi Line: all of equipment associated with grooving; applying adhesives, vinyl, coating; and drying of plywood vinyl laminated paneling products.

Chesapeake and Style Grain Print Lines: all the equipment associated with sanding; grooving; applying filler, basecoat, floodcoat, ink, topcoat, and sealer; and drying of plywood “printed” paneling products.

Paper Laminate Line: all of equipment associated with grooving; applying adhesives, paper, coating; and drying of plywood paper laminated paneling products.

UV Line: all the equipment associated with sanding, staining, coating, and drying of plywood “UV” paneling products.

Hardwood Plywood Line: all of equipment associated with applying adhesives, pressing, sanding, and sawing of various species of hardwood plywood.

Miscellaneous other operations are conducted involving plywood.

Cut to Size Operations: A separate building housing beam saws, tenor saws, nose & groove saws, and computer operated saws that cut plywood sheets into furniture fill pieces (draw sides, bottoms, etc.) for shipment to furniture manufacturers. No coatings are applied to such cut pieces in this building.

Woodhog: This equipment grinds all scrap wood, wooden pallets, and damaged paneling products into wood chips for sale as boiler fuel.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Process A: Plywood Paneling Multi-Line Line Products							
Multi-Line	2	Vinyl Laminated Product Processes. 1994	15,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-2	PM/PM-10	March 1, 2005
Process B: Plywood Paneling Print Products							
Chesapeake Line	2	Print Product Processes. 1967	53,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-2	PM/PM-10	N/A
Style Grain Line	1	Print Product Processes. 1967	57,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-1	PM/PM-10	N/A
Process C: Plywood Paneling Paper Laminated Products							
Paper Laminate Line	1	Paper Laminated Product Processes. 1970	53,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-1	PM/PM-10	N/A
Process D: Plywood Paneling UV Products							
UV-Line	4	UV Coating Product Processes. 2000	14,000 sq ft/hr	MAC 144. Mph 153, 2000	BH-4	PM/PM-10	March 1, 2005
Process E: Cut to Size Plywood Products							
Cut to Size	5	Plywood Furniture Piece Production Processes. 1969	7,000 sq ft/hr	Pneumafil, Reverse Air II Model 13.5-460-12, 2000	BH-5	PM/PM-10	N/A
Process F: Wood Chips							
Woodhog	7	Wood Grinder, Montgomery Industries, Model 63PM-KC. 1972	1.5 ton/hr	Water mist, 1972	WH-1	PM/PM-10	N/A
Process G: Hardwood Plywood Products							
Hardwood Layup-Line	3 & 6	Hardwood Plywood Product Process. 2003	23,040 square feet/hr	Wheelabrator Frye, 6P Model 120 Jet III, 1975. Pneumafil, Reverse Air II Model 13510, 2003	BH-3 & BH-6	PM/PM-10	March 1, 2005

(Condition 2 of NSR Permit of March 1, 2005)

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Process Equipment Requirements—Multi-Line (NSR Permit Requirements)

A. Limitations

1. **Emission Controls** - Particulate emissions from the multi-line shall be controlled by a fabric filter (BH-2). The fabric filter shall be provided with adequate access for inspection and shall be in operation when conducting grooving operations.
(9 VAC 5-80-110 and Condition 5 of NSR Permit of March 1, 2005)
2. **Production** - The multi-line production of plywood paneling shall not exceed 90,000,000 square feet per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 14 of NSR Permit of March 1, 2005)
3. **Throughput** - The multi-line throughput of volatile organic compounds (adhesives, topcoats, etc.) used in the production of **plywood paneling** shall not exceed 9.0 tons/yr, calculated **monthly as the sum of each consecutive 12-month period**. The VOC content of the coatings used on any vinyl laminate product shall not exceed 3.8 pounds per gallon, excluding water, as delivered by the coating applicator. The 3.8 pounds per gallon of VOC limitation shall apply to each individual coating or to the volume weighted average of the coatings. Any such averaging time shall not exceed a 24-hr period.
(9 VAC 5-80-110 and Condition 15 of NSR Permit of March 1, 2005)
4. **Fuel** - The approved fuel for the **ovens** is **natural gas**. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-110 and Condition 16 of NSR Permit of March 1, 2005)
5. **Visible Emission Limit** - Visible emissions from the multi-line fabric filter (BH-2) shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) when the Multi Line is operating
(9 VAC 5-80-110 Condition 20 of NSR Permit of March 1, 2005)
6. **Emission Limits** - Emissions from the operation of the multi-line (**all items except ovens**) shall not exceed the limits specified below:

Volatile Organic Compounds	14.0 lbs/hr	9.0 tons/yr	(9 VAC 5-50-260)
PM/PM10	0.3 lbs/hr	0.8 tons/yr	(9 VAC 5-50-260)

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 1, 2, 3, and 5.
(9 VAC 5-80-110 and Condition 19 of NSR Permit of March 1, 2005)

B. Monitoring

1. Fabric Filter: The fabric filter (BH-2) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed and maintained and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating. The differential pressure drop shall be read and recorded at least once each calendar day that the multi-line operates. Any pressure drop less than 1.0 inch or greater than 6.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.

(9 VAC 5-80-110 and Conditions 7 and 8 of NSR Permit of March 1, 2005)

2. The permittee shall check the multi-line fabric filter stack (BH-2) at least once each calendar week (Monday-Sunday) during daylight hours of normal operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to eliminate the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average is equal to or greater than five (5) percent, the VEE shall continue for one hour from initiation on the stack.

(9 VAC 5-80-110 and Condition 9 of NSR Permit of March 1, 2005)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. A monthly and annual emissions estimate of VOC emissions from all of the materials (coatings, adhesives, thinners, etc.) used on the multi-line. The annual emissions shall be calculated monthly as the sum of each consecutive 12-month period. The VOC content shall be obtained from MSDS or other vendor information. If the VOC content is given as a range, the maximum shall be used in the calculation.
2. Annual production (in thousands of square feet) of plywood paneling on the multi-line, calculated monthly as the sum of each consecutive 12-month period.
3. Material Safety Data Sheet or other vendor information showing the VOC content of all materials used on multi-line processes.
4. Fabric filter daily pressure differential device readings, any upsets, corrective actions for upsets, visible emission checks, and any VEE conducted.
5. The VOC content of vinyl laminate top coat(s), as applied (including added thinner), to show compliance with Condition 3. The VOC content shall be obtained from MSDS or other vendor information. If the VOC content is given as a range, the maximum shall be used in the calculation.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.

(9 VAC 5-80-110 and Conditions 8 and 22 of NSR Permit of March 1, 2005)

IV. Process Equipment Requirements – UV-Line

A. Limitations

1. **Throughput** - The uv-line throughput of stain coatings shall not exceed 5,000 gallons per year, calculated monthly as the sum of each consecutive 12-month period. The volatile organic compounds (VOC) content of the stain coatings shall not exceed 7.2 pounds per gallon, as applied (including added thinner). The uv-line throughput of uv coatings shall not exceed 18,000 gallons per year, calculated monthly as the sum of each consecutive 12-month period. The VOC content of the uv coatings shall not exceed 0.02 pounds per gallon, as applied.
(9 VAC 5-80-110 and Condition 13 of NSR Permit of March 1, 2005)
2. **Emission Controls** - Particulate emissions from the uv-line plywood operations shall be controlled by a fabric filter (BH-4). The fabric filter shall be provided with adequate access for inspection and shall be in operation when conducting sanding operations.
(9 VAC 5-80-110 and Condition 6 of NSR Permit of March 1, 2005)

3. **Production** - The uv-line production of plywood paneling line shall not exceed 30,000,000 square feet per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 12 of NSR Permit of March 1, 2005)
4. **Fuel** - The approved fuel for the oven is natural gas. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-110 and Condition 16 of NSR Permit of March 1, 2005)
5. **Visible Emission Limit** - Visible emissions from the fabric filter for the uv-line (BH-4) shall not exceed five (5) % opacity.
(9 VAC 5-80-110 and Condition 20 of NSR Permit of March 1, 2005)
6. **Emission Limits** - Emissions from the operation of the UV plywood paneling line (all items except oven) shall not exceed the limits specified below:

Volatile Organic Compounds 17.4 lbs/hr 18.2 tons/yr (9 VAC 5-50-260)

PM/PM-10 0.8 lbs/hr 0.9 ton/yr (9 VAC 5-50-260)

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 14, 15, 16, and 18.

(9 VAC 5-80-110 and Condition 18 of NSR Permit of March 1, 2005)

B. Monitoring

1. **Fabric Filter:** The fabric filter (BH-4) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed and maintained and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating. The differential pressure drop shall be read and recorded at least once each calendar day that the uv-line operates. Any pressure drop less than 1.0 inch or greater than 6.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.
(9 VAC 5-80-110 and Conditions 7 and 8 of NSR Permit of March 1, 2005)

2. The permittee shall check the uv-line fabric filter stack (BH-4) at least once each calendar week (Monday-Sunday) during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to eliminate the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds five (5) percent, the VEE shall continue for one hour from initiation on the stack.
(9 VAC 5-80-110 and Condition 9 of NSR Permit of March 1, 2005)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. Annual production of uv-line plywood paneling products (thousands of sq ft), calculated monthly as the sum of each consecutive 12-month period.
2. Material Safety Data Sheet or other vendor information showing the VOC content (lb/gal) of the stains and coatings used on the uv-line. If thinners are used, the VOC content, as applied.
3. Annual throughput of uv coatings and stains (in gallons) used on the uv-line, calculated monthly as the sum of each consecutive 12-month period.
4. Fabric filter daily pressure differential device readings, any upsets, corrective activities for upsets, visible emission checks, and any VEE conducted.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.

(9 VAC 5-50-50, 9 VAC 5-80-110, and Conditions 8 and 22 of NSR Permit of March 1, 2005)

V. Process Equipment Requirements—Harwood Plywood Layup-Line

A. Limitations

1. **Emission Controls** – **Particulate matter** emissions from the layup-line plywood sawing and sander/grader operations shall be controlled by one **fabric filter (BH-6)**. **Particulate matter** emissions from the layup-line plywood calibrating sander operations shall be controlled by one **fabric filter (BH-3)**. The **fabric filters** shall be provided with adequate access for inspection and shall be in operation when any process is conducting sawing and sanding operations.
(9 VAC 5-80-110 and Condition 4 of NSR Permit of March 1, 2005)
2. **Visible Emission Limit** - Visible emissions from each fabric filter exhaust shall not exceed **5%** opacity as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A).
(9 VAC 5-80-110 and Condition 20 of NSR Permit of March 1, 2005)
3. **Production** - The layup-line production of hardwood plywood paneling shall not exceed 92,160,000 square feet per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 11 of NSR Permit of March 1, 2005)
4. **Fuel** - The approved fuel for the **Cleaver Brooks boiler** is **natural gas**. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-110 and Condition 16 of NSR Permit of March 1, 2005)
5. **Emission Limits** - Emissions from the operation of the layup-line **hardwood plywood paneling production (all items except boiler)** shall not exceed the limits specified below:

Volatile organic compounds	1.1 lb/hr	2.2 tons/yr
Particulate Matter/PM-10	4.4 lbs/hr	8.7 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 26, 27, and 28.
(9 VAC 5-80-110 and Condition 17 of NSR Permit of March 1, 2005)

B. Monitoring

1. Fabric Filter: each fabric filter (BH-3 &6) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed and maintained and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating. The differential pressure drop shall be read and recorded at least once each calendar day that the layup operates. Any pressure drop less than 1.0 inch or greater than 6.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.

(9 VAC 5-80-110 and Conditions 7 and 8 of NSR Permit of March 1, 2005)

2. The permittee shall check each layup-line fabric filter stack (BH-3 & 6) at least once each calendar week (Monday-Sunday) during daylight hours of normal operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to eliminate the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds five (5) percent, the VEE shall continue for one hour from initiation on the stack.

(9 VAC 5-80-110 and Condition 9 of NSR Permit of March 1, 2005)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. Annual production (in thousands of square feet) of hardwood plywood layup-line, calculated monthly as the sum of each consecutive 12-month period.
2. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content of materials used on layup-line.

3. The fabric filter daily pressure differential device readings, any upsets, corrective activities for upsets, visible emission checks, and any VEE conducted.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.

(9 VAC 5-80-110 and Conditions 8 and 22 of NSR Permit of March 1, 2005)

VI. Multi, UV, and Hardwood Layup Lines (NSR General Requirements)

A. Limitations

1. **Maintenance/Operating Procedures** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures.

(9 VAC 5-80-110, 9 VAC 5-50-20 E, and Condition 27 of NSR Permit of March 1, 2005)

2. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.

(9 VAC 5-80-110, 9 VAC 5-20-180 I, and Condition 26 of NSR Permit of March 1, 2005)

B. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. The permittee shall maintain records of the training provided for air pollution control equipment, including the names of trainees, the date of training and the nature of the training.
2. The permittee shall maintain records of the scheduled and unscheduled maintenance activities.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.

(9 VAC 5-80-110, 9 VAC 5-50-50, and Conditions 22 and 27 of NSR Permit of March 1, 2005)

C. Reporting

1. **Notification for Control Equipment Maintenance** - The permittee shall furnish notification to the [Director, Tidewater Regional Office](#) of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to the shutdown. The notification shall include, but is not limited to, the following information:
 - a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;
 - b. The expected length of time that the air pollution control equipment will be out of service;
 - c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;
 - d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

(9 VAC 5-80-110, 9 VAC 5-20-180 B, and Condition 23 of NSR Permit of March 1, 2005)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-80-110, 9 VAC 5-40-30, and Condition 10 of NSR Permit of March 1, 2005)
2. If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
VOC Content	EPA Methods 24, 24a
PM/PM-10	EPA Method 5, 17, 201, 202
Visible Emission	EPA Method 9

(9 VAC 8-80-110)

VII. Process Equipment Requirements--Chesapeake and Style Grain Lines**A. Limitations**

Table VII.A.1 Emission Limitations for each of the Chesapeake and Style Grain Lines.			
Regulated Pollutant	Limitation/Standard	Applicable Requirement	Reference Method 40 CFR 60, Appendix A
PM	0.05 grains per scf of exhaust	9 VAC 5-40-2270	Method 5, 17, 202
VOC	6.0 lbs per 1000 sq ft of paneling, as applied, per coating type	9 VAC 5-40-4930	Method 24, 24a, 18, 25, 25a

1. Particulate emissions from the Chesapeake and Style Grain plywood paneling lines shall be controlled by fabric filters (BH-2 & BH-1 respectively). The fabric filters shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and 9 VAC 5-40-2270)
2. Visible emissions from the fabric filter stack (BH-1) for Style Grain Line shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed (60)% opacity.
(9 VAC 5-40-80 and 9 VAC 5-80-110)
3. Since the Multi Line and the Chesapeake Line share the same fabric filter (BH-2), visible emissions from the fabric filter stack (BH-2) for the Chesapeake Line shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed (60)% opacity only when the Multi-Line is not operating. If the Multi-Line is operating, visible emissions from the fabric filter (BH-2) stack shall not exceed five (5)% opacity as determined by EPA Method 9 (reference 40 CFR 60. Appendix A).
(9 VAC 5-40-80, 9 VAC 5-80-110, and Condition 20 of NSR Permit of March 1, 2005)
4. VOC emissions from each coating or group of coatings performing the same function or are of the same type used on Chesapeake line and Style Grain line, shall not exceed limits specified in **Table VII.A.1** (6.0 lb of VOC per 1000 sq ft), regardless of the number of coats applied. Compliance shall be demonstrated on a daily basis (maximum averaging period of a 24-hr period) for each line and coating by coating or for each group of coatings (the VOC emissions for the day are the used gallons of coating(s) multiplied by the lb of VOC per gallon coating plus the gallons of thinner(s) multiplied by the lb of VOC per gallon thinner, and divide by the 24-hr production of surface area (in 1000's of sq ft)). An acceptable alternative compliance demonstration can also be made by combining all of the VOC emissions for all of the coatings and thinners used for the day to meet the limits of **Table VII.A.1**. (Compliance for all coatings combined assures compliance coating by coating and for every group of coatings used.)
(9 VAC 5-80-110, 9 VAC 5-40-4930, 9 VAC 5-40-2270)

B. Monitoring

1. Fabric Filters: Each fabric filter (BH-1 & BH-2) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed and maintained and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating. The differential pressure drop shall be read and recorded at least once each calendar day that the Chesapeake and Style line operates. Any pressure drop less than 1.0 inch or greater than 6.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.
(9 VAC 5-80-110)
2. The permittee shall check the Chesapeake and Style Grain lines fabric filter stacks (BH-2 & 1) at least once each calendar week (Monday-Sunday) during daylight hours of normal operations for visible emissions for at least six minutes. If visible emissions are noted from the either stack or both stacks, maintenance shall be performed on the fabric filter to eliminate the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack(s) for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds five (5) percent for BH-2 when the Multi-Line is operating, the VEE shall continue for one hour from initiation on the stack; otherwise, if the VEE exceeds ten (10) percent for BH-2, the VEE shall continue for one hour from initiation on the stack. If the VEE exceeds ten (10) percent for BH-1, the VEE shall continue for one hour from initiation on the stack
(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content (lb/gal) of materials used on Chesapeake and Style Grain lines.
2. The daily calculation of VOC emissions per 1000 square feet of printed plywood paneling for the Chesapeake and Style Grain lines.
3. Fabric filter daily pressure differential device readings, any upsets, corrective activities for upsets, visible emission checks, and any VEE conducted.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.
 (9 VAC 5-80-110)

VIII. Process Equipment Requirements—Paper Laminate Line

A. Emission Limitations

Table VIII.A.1 Emission Limitations for the Paper Laminate Line.			
Regulated Pollutant	Limitation/Standard	Applicable Requirement	Reference Method 40 CFR 60, Appendix A
PM	0.05 grains per scf of exhaust	9 VAC 5-40-2270	Method 5, 17, 202
VOC	Coatings: 2.9 lbs per gallon, excluding water, as applied, per type	9 VAC 5-40-4330	Method 24, 24a

1. Particulate emissions from the Paper Laminate Line shall be controlled by a fabric filter (BH-1). The fabric filter shall be provided with adequate access for inspection.
 (9 VAC 5-80-110 and 9 VAC 5-40-2270)
2. Visible emissions from the Paper Laminate Line fabric filter stack (stack 1) shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed sixty (60)% opacity.
 (9 VAC 5-80-110 and 9 VAC 5-40-80)
3. VOC emissions from coatings applied to paper surface on the Paper Laminate Line shall not exceed the limits specified in **Table VIII.A.1** (2.9 lbs VOC/gal, excluding water) on a coating by coating basis or volume weighted average for each coating of the same type or performs the same function. If averaging is done for a coating type, the averaging time shall not exceed a 24-hr period.
 (9 VAC 5-80-110, 9 VAC 5-40-2270, and 9 VAC 5-40-4330)

B. Monitoring

1. Fabric Filter: The fabric filter (BH-1) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed and maintained and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating. The differential pressure drop shall be read and recorded at least once each calendar day that the Paper Laminate line operates. Any pressure drop less than 1.0 inch or greater than 6.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.

(9 VAC 5-80-110)

2. The permittee shall check the Paper Laminate Line fabric filter stack (stack 1) at least once each calendar week (Monday-Sunday) during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to eliminate the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds ten (10) percent, the VEE shall continue for one hour from initiation on the stack.

(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. Fabric filter daily pressure differential device readings, any upsets, corrective activities for upsets, visible emission checks, and any VEE conducted.

2. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content (lb/gal) of materials used on Paper Laminate Line. If coatings are thinned, the VOC content as applied to demonstrate compliance with Table VIII.A.1. If averaging is done, daily calculation of lb/gal per coating type to demonstrate compliance with Table VIII.A.1.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.
(9 VAC 5-80-110)

IX. Process Equipment Requirements--Woodhog

A. Limitations

1. Emissions from the woodhog operation shall not exceed the limits specified below:

Particulate Matter 0.05 grains/scf of exhaust.
(9 VAC 5-80-110 and 9 VAC 5-40-2270)
2. Particulate emissions from the woodhog feed chute (stack 7) shall be controlled by wet suppression and a shroud or flaps that are kept in good operational condition. Particulate emissions from the woodhog chip receiving truck trailers shall be controlled by a partial enclosure (roof and two sides) over the trailers. Good housekeeping practices shall also be employed to minimize the amount of particulate emissions. The ground areas around the woodhog and trailers shall be cleaned at least once each day of woodhog operations. The woodhog and truck loading area shall be provided with adequate access for inspection.
(9 VAC 5-40-90 and VAC 5-80-110)
3. Visible emissions from the woodhog process shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed sixty (60)% opacity.
(9 VAC 5-40-80 and 9 VAC 5-80-110)

B. Monitoring

1. The permittee shall check the condition of the woodhog shroud or flaps for the feed chute at least weekly (Monday-Sunday) to ensure good operational condition.
(9 VAC 5-80-110)

2. The permittee shall check the woodhog (stack 7) at least once each calendar week (Monday-Sunday) during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, the water flow to the woodhog water mister must be checked. If visible emissions continue after the water flow has been corrected, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds ten (10) percent, the VEE shall continue for one hour from initiation on the stack.
(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. Start times and dates of woodhog operation with a notation indicating that the wet suppression was turned on and the operator's name.
2. Checks on the condition of the woodhog feed chute shroud/flaps.
3. Visible emission checks and any VEE conducted.
4. Dates of the woodhog and truck loading area clean up.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.

(9 VAC 5-80-110)

X. Process Equipment Requirements—Cut to Size Operations

A. Limitations

1. Particulate emissions from the Cut to Size Operations shall be controlled by a fabric filter (BH-5). The fabric filters shall be provided with adequate access for inspection. (9 VAC 5-80-110)
2. Visible emissions from the Cut to Size Operation fabric filter stack (BH-5) shall not exceed twenty (20) % opacity except during one six-minute period in any one hour in which visible emissions shall not exceed sixty (60) % opacity. (9 VAC 5-40-80 and 9 VAC 5-80-110)
3. Emissions from the fabric filter (BH-5) for the Cut to Size Operations shall not exceed the limits specified below:

Particulate Matter 0.05 grains/scf of exhaust.
(9 VAC 5-80-110 and 9 VAC 5-40-2270)

B. Monitoring

1. Fabric Filter: The fabric filter (BH-5) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed and maintained and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating. The differential pressure drop shall be read and recorded at least once each calendar day that the cut-to-size operates. Any pressure drop less than 1.0 inch or greater than 6.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit
(9 VAC 5-80-110)
2. The permittee shall check the Cut to Size fabric filter stack (stack 5) at least once each calendar week (Monday-Sunday) during daylight hours of normal operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to eliminate the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds ten (10) percent, the VEE shall continue for one hour from initiation on the stack.
(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. The fabric filter daily pressure differential device readings, any upsets, corrective activities for upsets, visible emission checks, and any VEE conducted.

These records kept at the facility, made available on site for inspection by the DEQ, and shall be current for the most recent five years.

(9 VAC 5-80-110)

XI. Layup, Multi, Chesapeake, Style Grain, Paper Laminate, UV, Lines (MACT requirements)

1. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the multi-line and uv-line shall be operated in compliance with the requirements of 40 CFR 63, Subpart QQQQ. Except where this permit is more restrictive than the applicable requirement, the layup-line as described shall be operated in compliance with the requirements of 40 CFR 63, Subpart DDDD and DDDDD.

(9 VAC 5-80-110, 9 VAC 5-60-100, and Condition 21 of NSR Permit of March 1, 2005)

XII. Insignificant Emission Units

1. The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PPL 1-6	6 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
CPL 1-9	9 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
SGPL 1-8	8 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
EL 1-4	4 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
EG-1	Emergency generator (natural gas)	9 VAC 5-80-720 C		20 KW/hr
FP-1	Emergency fire water pump. (diesel)	9 VAC 5-80-720 C		220 HP/hr

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

XIII. Permit Shield & Inapplicable Requirements

1. Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
None identified		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

XIV. General Conditions

A. Federal Enforceability

1. All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

1. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
 - a. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
 - b. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
 - c. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
 - d. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
 - e. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.
(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D, and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.
(9 VAC 5-80-110 F)
2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110 F)
3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

1. Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the certification. The time period to be addressed is January 1 to December 31.
 - b. The identification of each term or condition of the permit that is the basis of the certification.
 - c. The compliance status.
 - d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
 - e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
 - f. Such other facts as the permit may require to determine the compliance status of the source.
 - g. One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

1. The permittee shall notify the Director, Tidewater Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition 81 of this permit.
(9 VAC 5-80-110 F.2, and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

1. In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Tidewater Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Tidewater Regional Office.
(9 VAC 5-20-180 C and Condition 24 of NSR Permit of March 1, 2005)

G. Severability

1. The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

1. The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

1. A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190, 9 VAC 5-80-260, and Condition 1 of NSR Permit of March 1, 2005)

K. Property Rights

1. The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6 and Condition 30 of NSR Permit of March 1, 2005)
2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

1. The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

1. During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
 - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
 - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
 - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.
- (9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

1. At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)

P. Alternative Operating Scenarios

1. Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

1. The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
 - a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
 - d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
(9 VAC 5-80-110 K.2 and Condition 25 of NSR Permit of March 1, 2005)

R. Reopening For Cause

1. The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.
 - a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.
(9 VAC 5-80-110 L)

S. Permit Availability

1. Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E and Condition 31 of NSR Permit of March 1, 2005)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160 and Condition 29 of NSR Permit of March 1, 2005)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - (1) A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - (2) The permitted facility was at the time being properly operated.
 - (3) During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

- (4) The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.
(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

1. A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C, 9 VAC 5-80-260, and Condition 28 of NSR Permit of March 1, 2005)

W. Duty to Supplement or Correct Application

1. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

1. If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

1. The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

1. If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

1. No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

1. Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
 - (1) All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
 - (2) The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

- (3) The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110 I)

XV. State-Only Enforceable Requirements

1. The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

State odor rule: 9 VAC 5-40-140
(9 VAC 5-80-110 N)

June 20, 2005

Mr. J. A. (Jay) Byrd
Vice President Manufacturing Services
Chesapeake Hardwood Products, Inc.
201 Dexter Street, West
Chesapeake, Virginia 23327

Location: Chesapeake
Registration No: 60851
AIRS No: 51-550-00056

Dear Mr. Byrd:

Attached is a modified Operating Permit to operate a plywood paneling facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

The permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all permit conditions carefully.

In evaluating the application and arriving at a final decision to issue this permit, the Department deemed the application complete on March 1, 2005, and solicited written public comments by placing a newspaper advertisement in the Virginian Pilot newspaper on May 5, 2005. The thirty-day comment period (provided for in 9 VAC 5-80-270) expired on June 4, 2005. No comments were received.

This approval to operate does not relieve Chesapeake Hardwood Products, Inc., of the responsibility to comply with all other local, state, and federal permit regulations.

Mr. J.A. Byrd
June 20, 2005
Page 2

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. Robert G. Burnley, Director
Department of Environmental Quality
P.O. Box 10009
Richmond, Virginia 23240-0009

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Rule 2A of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please call Mr. Barry Halcrow at 757-518-2184.

Sincerely,

Harold J. Winer
Deputy Regional Director

HJW/BWH/Chesapeake Hardwood T-5 sig mod 2005.doc

Attachment: Permit

Statement of Legal and Factual Basis

cc: Director, OAPP (electronic file submission)

Manager, Data Analysis (electronic file submission)

Chief, Permits and Technical Assessment Branch (3AP11), U.S. EPA, Region III

Sharon McCauley, EPA Permitting (electronic file submission)